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BY ECFAND E-MAIL

The Honorable Victor Marrero United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, NY 10007



Re: Re: United States v Villafane, Juan Kuang

21 cr 93 (VM)

Dear Judge Marrero:

I write seeking permission for myself and my paralegal o file interim vouchers in the instant case. I was appointed to represent Mr. Kuang in the above reference matter pursuant to the Criminal Justice Act at Mr. Kuang's first appearance. I have continued to represent him throughout the pendency of the case. I have spent in excess of 60 hours in my representation of Mr. Kuang. The discovery in this case has been voluminous with numerous productions. The Government has recently produced two more voluminous discovery productions. I have met with Mr. Kunag numerous times to discuss this case and confer with him regarding the discovery, My paralegal Jorge Cedeno has spent a considerable amount of time summarizing the pertinent discovery for my review. It remains uncertain whether Mr. Kuang will resolve this case via entering a plea or by trial. I am a sole practitioner and it is a financial burden for me to wait until the completion of the case to be paid. My paralegal likewise is not in a financial position to continue to wait for Mr. Cedeno's case to be resolved before receiving payment for his work. Accordingly, I respectfully request that the Court authorize me and my paralegal Jorge Cedeno to submit interim vouchers in this case.

Respectfully submitted, /s/
Donna R. Newman

Cc: Jorge Cedeno